

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh  
Chapter 11

Debtor.

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**DEBTOR'S SUBJECT MATTER SUPPLEMENT TO LIST OF WITNESSES**

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Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”), by its attorneys Richman & Richman LLC, by Michael P. Richman and Claire Ann Richman, pursuant to the Order Modifying Schedule for Hearing on Confirmation of Chapter 11 Plan [Doc 562], submits the following subject matter supplement to its List of Witnesses [Doc 586] identifying individuals with knowledge of the issues to be tried in the confirmation hearings on the Debtor’s amended Chapter 11 plan, scheduled to be held from July 21, 2025 to July 25, 2025.

This supplement is being filed to clarify previously-identified subjects of testimony in response to a statement made on July 3, 2025 by one of the Lenders’ proffered expert witnesses, Cynthia Nelson of FTI Consulting. In a supplemental and rebuttal report, she writes: “Debtor proffers no expert who will provide an opinion regarding the proper rate of interest to be paid Lender on account of its Claim.”

In its original List of Witnesses [Doc 586], the Debtor disclosed that plan feasibility was a specific area of potential testimony by all of its witnesses except for Mr. Jaeger. The Debtor submits that plan feasibility necessarily includes and covers

the proper rate of interest to be paid in respect of its proposed treatment of Lender Claims. The proper rate of interest is expressly discussed by Debtor's expert witness Deborah Friedland in her July 3, 2025 report in rebuttal to Ms. Nelson's prior expert report of June 6, 2025. Debtor's original List of Witnesses also stated expressly that its identified witnesses (including Ms. Friedland) could "testify in rebuttal to any other witnesses, including to any rebuttal reports to expert reports."

To eliminate any ambiguity that could be argued to arise from not identifying that the appropriate interest rate may be a subject of testimony separate from plan feasibility, the Debtor hereby clarifies and supplements its List of Witnesses to provide that all references therein to "feasibility" were and are intended to include the proper rate of interest to be paid in respect of its proposed treatment of Lender Claims.

As it did in its original List of Witnesses, the Debtor also reserves the right to further amend and supplement the List of Witnesses and subjects as may be appropriate on the basis of the disclosures of other parties and subsequent developments.

*[Signature Appears on the Following Page]*

Dated: July 7, 2025.

**RICHMAN & RICHMAN LLC**  
**Attorneys for Wisconsin &**  
**Milwaukee Hotel LLC**

By:           /s/ Michael P. Richman          

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